

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA**

Plaintiff,

vs.

CREDFORCE AMERICA, INC.

Defendant.

CIVIL ACTION

No. 2:20-cv-05096-PBT

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff, Trustees of the University of Pennsylvania, by its agent the Aresty Institute of Executive Education of the Wharton School ("Plaintiff" or "Wharton"), hereby files this Motion for Default Judgment against defendant CredForce America, Inc. ("CredForce" or "Defendant") pursuant to Federal Rule of Civil Procedure 55(b). For the reasons set forth in the attached Memorandum of Law and Declaration, Wharton respectfully requests that the Court entered a default judgment in Wharton's favor and against Defendant \$1,210,493.45 currently due and enter a permanent injunction precluding Defendant from using any of Plaintiff's intellectual property on its website or advertising as set forth in the proposed order.

Respectfully submitted,

SIRLIN LESSER & BENSON, P.C.

/s/ Patrick J. Troy
Patrick J. Troy (PA Id. 89890)
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Attorneys for Plaintiff

Dated: February 23, 2021